

# RegiCargo — Privacy Policy

Version 1.0 | April 2026

## 1. Data Controller

RegiCargo B.V. is responsible for processing your data according to this privacy policy.

**Company:** RegiCargo B.V.

**Address:** [address]

**Chamber of Commerce:** [KvK number]

**VAT Number:** [VAT number]

**Data Protection Officer (DPO):** [dpo-email@regicargo.com]

## 2. Data We Collect

RegiCargo processes various categories of personal data from users, drivers, and company contact persons:

### 2.1 User Data

Full name, email address, hashed password, phone number, billing address, email verification status, and account creation/modification timestamps.

### 2.2 Company Data

Company name, KvK number, VAT number, contact person, contact email/phone, full company address, verification status, and subscription status.

### 2.3 Vehicle Data

License plate, make, model, year, vehicle type, active/inactive status, and company association.

### 2.4 Cargo & Capacity Data

Loading/unloading address with precise coordinates, pickup/delivery time windows, weight, volume, vehicle type, special equipment requirements, pricing formula, creator, company, status, and expiry date.

### 2.5 Trip & Delivery Data

Scheduled/actual pickup and delivery times, assigned driver and vehicle, exception log, and final agreed rate.

### 2.6 GPS Tracking

Latitude/longitude (8 decimals  $\approx$  1 cm accuracy), accuracy, speed, heading, and recorded timestamp. These records are immutable (append-only) and serve as an immutable audit trail. Collected only during active trips.

### 2.7 Documents

Document type, file path, original filename, MIME type, file size, uploader, upload timestamp, and virus scan status. These documents are immutable.

### 2.8 Onboarding & Engagement Data

Tour progress, checklist completion, dismissed tips, use-case selection, milestone timestamps, and onboarding version.

### 2.9 Proposal History

Sender and receiver companies/users, proposed rate, notes, status transitions, response timestamps, and rejection reasons.

### 3. Legal Bases for Processing

We process personal data under GDPR Article 6(1):

- Article 6(1)(b) — Contract Performance: account and vehicle management, trip/offer support, proposal workflows, invoicing, and GPS tracking for delivery verification.
- Article 6(1)(a) — Consent: certain categories only with explicit consent.
- Article 6(1)(f) — Legitimate Interest: platform security, fraud detection, legal compliance, dispute resolution, and service improvement.
- Article 6(1)(c) — Legal Obligation: processing required by applicable law.

### 4. Purposes of Processing

We process data for:

- Account and compliance management
- Company verification and subscription management
- Marketplace functionality
- Trip/delivery execution
- Security and fraud detection
- Dispute resolution and legal defense
- Service improvement
- Communication

### 5. Recipients and Third-Party Processors

RegiCargo shares data with these third parties under Data Processing Agreements:

#### 5.1 Google Cloud (Google Maps Platform)

Places Autocomplete, Directions API, and Geocoding API. Data: addresses, route distances. Google operates under Standard Contractual Clauses.

#### 5.2 OpenStreetMap / Overpass API

POI and infrastructure data. Public data; no personal data transmitted.

#### 5.3 OpenChargeMap (OCM)

EV charging station data. Data: route coordinates. OCM data is public.

#### 5.4 Postmark

Transactional email provider. Data: recipient email addresses, proposal notifications. Operates under DPA.

#### 5.5 WhatsApp (Link Sharing Only)

Users share links client-side via their phone. RegiCargo does not transmit data to WhatsApp servers.

### 6. Data Retention Periods

Data is retained as long as necessary:

- User accounts: during active life plus 1 year after deletion.
- Company data: during active subscription plus 7 years (accounting compliance).
- GPS data: permanently immutable. Retention policy operationally defined.
- Documents: permanently immutable. Cannot be deleted due to legal holds.
- Proposal history: during trip lifecycle plus 3 years.

- Onboarding tracking: 1 year.

## 7. International Data Transfers

Google Maps, Postmark, and OpenChargeMap may process data outside the EU. Transfers are protected by Standard Contractual Clauses and Adequacy Decisions.

## 8. Your Rights

Under GDPR, you have the following rights:

- 8.1 Right of Access (Art. 15): Request a copy of your data.
- 8.2 Right of Rectification (Art. 16): Correct inaccurate data.
- 8.3 Right to Erasure (Art. 17): Request deletion (except for immutable data).
- 8.4 Right to Restriction (Art. 18): Request restriction of processing.
- 8.5 Right to Portability (Art. 20): Receive data in machine-readable format.
- 8.6 Right to Object (Art. 21): Object to processing based on legitimate interest.

Contact: [dpo-email@regicargo.com]. We respond within 30 days.

## 9. Driver GPS Tracking: Special Considerations

RegiCargo collects GPS locations with high precision (8 decimals  $\approx$  1 cm) during active trips. Data is immutable and serves as an audit trail.

Legal basis: Article 6(1)(b) (contract performance) and Article 6(1)(f) (legitimate interest in delivery proof and dispute resolution).

Carriers (employers) must inform drivers that GPS is collected. Where applicable, works councils must be consulted before introducing tracking.

GPS is collected only during active trips. Drivers can view their own GPS history via the dashboard.

## 10. Automated Decision-Making

RegiCargo's matching algorithm produces ADVISORY suggestions. Article 22 GDPR does NOT apply because matching is not binding and human review is required.

## 11. Security and Protection

RegiCargo implements:

- Encryption in transit (TLS 1.3+) and at rest (AES-256)
- Role-based access controls (RBAC)
- Regular security audits and penetration testing
- Malware scanning for all uploads
- Immutability for GPS and document data
- Secure logging and audit trails

## 12. Cookies and Tracking

RegiCargo uses cookies for session management, CSRF prevention, and user preference retention. See our separate Cookie Policy for details.

## 13. Changes to This Policy and Contact

RegiCargo may periodically update this policy. We will notify you of significant changes.

For privacy questions or to exercise your rights:

Data Protection Officer (DPO): [dpo-email@regicargo.com]

You have the right to lodge a complaint with your national data protection authority.

Last Updated: April 2026